

1 Noel Grefenson  
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7 Attorney for Josh Hall

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE DISTRICT OF OREGON

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 JOSH HALL,

14 Defendant.

Case No.: CR 10-229 BR

SUPPLEMENTAL DECLARATION OF  
NOEL GREFENSON IN SUPPORT OF  
MOTION TO CONTINUE TRIAL

15 Under the penalty for perjury, I, Noel Grefenson, hereby certify that the following  
16 facts are true and correct to the best of my knowledge and belief:

17 1. I am substitute counsel for defendant Josh Hall, who is charged in this case  
18 with Bank Fraud and making False Statements to a Bank in the District of Oregon. I was  
19 appointed by this Court on March 11, 2011.

20 2. I make this supplemental declaration to support a previously filed motion to  
21 continue trial. Mr. Hall is out of custody pending resolution his charges.

22 3. Trial in this case is set for December 13, 2011. The parties have agreed that  
23 the government will dismiss its indictment and charge defendant with a misdemeanor  
24 offense. Counsel for the parties require additional time to complete investigation on the

1 factual basis for the new charge to be filed against Mr. Hall and the loss attributed to that  
2 offense for purposes of any restitution which could be attributed to his conduct.

3 4. On October 26, 2011, the co-defendant in this case, David J. VanBeenen,  
4 entered a plea of guilty to a Superseding Information.

5 5. I have discussed Mr. Hall's speedy trial rights with him on multiple  
6 occasions. Mr. Hall is aware of his speedy trial rights and agrees that a postponement of  
7 his scheduled trial date is reasonable and necessary for the reasons stated above.

8 6. Counsel for the Government, Michelle Kerin, agrees with and joins in the  
9 requested continuance.

10 7. For the reasons stated above and considering that a postponement will  
11 facilitate the fair and just resolution of this case, I maintain that under Title 18 U.S.C §  
12 3161(h)(7)(A), (B) the ends of justice served by postponement of a trial herein outweigh  
13 the interest of the public and the defendant in a speedy trial.  
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15 Dated: December 7, 2011.

16 */s/ Noel Grefenson*

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18 Noel Grefenson, OSB No. 88216  
19 Attorney for Defendant Hall  
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